SAN JOAQUIN FARM BUREAU FEDERATION



MEETING TODAY'S CHALLENGES / PLANNING FOR TOMORROW

January 22, 2019

California Air Resources Board 1001 I Street Sacramento, California, 95814 via email: http://www.arb.ca.gov/lispub/comm/bclist.php

RE: 2018 PM2.5 State Implementation Plan

San Joaquin Valley (the Valley)

Dear Sir/Madam:

We understand the Board will consider the 2018 PM2.5 State Implementation Plam for the San Joaquin Valley (the Plan) at your meeting scheduled for January 24th. We urge the Board to include the following two elements of the final plan.

Recommendation 1:

As part of the implementation plan, there should be an updated scientific evaluation of the health risks and costs from exposure to ambient PM2.5 in the San Joaquin Valley. There has been a dramatic decrease in exposure to PM2.5 over the last twenty years. Accordingly, there should be proper studies that show the health effects, costs and benefits of the control programs implemented over the last twenty years and likely benefits and costs of programs to further reduce ambient PM2.5 in the Valley.

Recommendation 2:

The San Joaquin Valley Air Pollution Control District (SJVAPCD or the District) and Board should implement the incentive elements of PM2.5 Plan, but delay implementation of the enhanced regulatory measures pending the results of further studies.

The development and submission of the Plan will not be significantly delayed by incorporating these important recommendations. We believe incentive-based approaches are needed to meet air quality objectives while also protecting the business community in the region.

Sincerely,

Jim Terrari

Jim Ferrari President